

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Hai Dong Li, Zhong Wang, Shoudong Li, Individually and  
on Behalf of All Others Similarly Situated

Case 1:18-CV-02270-GHW

Plaintiffs,

-against-

Alibaba Group Holding Ltd.; Ant Financial Service Group,  
Ltd. f/k/a Zhejiang Ant and Micro Financial Services  
Company, Ltd, Jack Yun Ma, Daniel Yong Zhang and  
Jungoing Sun

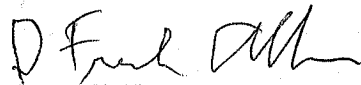
Defendants.  
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**MOTION TO WITHDRAW**

Comes The law firm of Shotkin & Associates Law Office PC by and through I Frederick Shotkin, Esq. and files this motion to withdraw as attorneys of record for Plaintiffs for the reasons set forth in the annexed declaration of I. Frederick Shotkin.

Respectfully submitted,

Shotkin & Associates Law Office PC

By 

I. Frederick Shotkin

To: Simpson, Thacher & Bartlett, LLP  
425 Lexington Avenue  
New York, New York 10017-3954  
Attention: Stephen P. Blake, Esq.

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Plaintiffs,

**Declaration**

-against-

Alibaba Group Holding Ltd.; Ant Financial Service Group,  
Ltd. f/k/a Zhejiang Ant and Micro Financial Services  
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Jungoing Sun

Defendants.  
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I. Frederick Shotkin, an attorney authorized to practice law in the State of New York and in the Federal District Court for the Southern District of New York, makes the following Declaration under the penalties of perjury.

1. I am an attorney with the law firm of Shotkin & Associates Law Office P.C. (hereinafter "S&ALO"), the attorneys of record for the Plaintiffs herein, and I make this declaration in support of the foregoing law firm's Motion to Withdraw as Plaintiff s' attorneys of record.

2. In December 2017, Plaintiff Haidong Li retained S&ALO to represent him and other plaintiffs in asserting a claim against the Defendants and its affiliates.

3. On March 14<sup>th</sup>, 2018, S&ALO filed a lawsuit on behalf of Plaintiffs against

Defendants in the Federal District Court for the Southern District of New York. (Case 1:18-CV-02270-GHW).

4. Plaintiffs have not served the complaint on any Defendant. Therefore, no Defendant has filed an answer, and no class has been certified.

5. We did, however, receive a letter from Simpson, Thacher & Bartlett, LLP (hereinafter "ST&B") dated April 3<sup>rd</sup> 2018, stating that they are the securities counsel to the Defendants. In this letter ST&B demanded a voluntary dismissal of the lawsuit and stated that it would respond on behalf of the Defendants if S&ALO does not voluntarily dismiss the lawsuit.

6. Subsequent to this event, certain information came into the possession of S&ALO that changed the complexion of the lawsuit as it was described by Plaintiffs to S&ALO.

7 S&ALO's is constrained from representing the Plaintiffs based on this new information. This new information makes it inappropriate for S&ALO under the circumstances to continue with their representation. In addition, Plaintiff Haidong Li has stated that Plaintiffs want S&ALO to withdraw as attorneys of record.

8. In view of the foregoing, both Plaintiffs and S&ALO determined that it would be in everyone's best interest, if S&ALO withdrew as counsel of record for Plaintiffs so that Plaintiffs may obtain new counsel if they opt to continue with a lawsuit.

9. The case is still in its early stages and nothing of substance has occurred thus far save for the filing of a complaint which as noted has not been served upon Defendants.

10. A Copy of this Motion has been served on ST&B and the Plaintiffs.

11. S&ALO is not asserting a retaining or changing lien.

**WHEREFORE**, Shotkin & Associates Law Office PC requests under Rule 1.4 of the local rules of the United States District Courts for the Southern and Eastern Districts of New York, that they be allowed to withdraw as attorneys of record for Plaintiffs and that Plaintiffs be allowed a reasonable time to obtain new attorneys if they wish to continue the lawsuit.

Dated: April 6, 2018  
New York, New York

Respectfully submitted,  
Shotkin & Associates Law Office P.C

A handwritten signature in black ink, appearing to read "I Fredeirck Shotkin", written over a horizontal line.

By: I Fredeirck Shotkin, Esq  
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